



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

FEE

DP BARCODE No.: D421652
PC CODE: 128825
FOOD USE: Yes

FILE SYMBOL NO.: 89168-GA DECISION No.: 491981
ACTION CODE: R 310
PRODUCT NAME: Liberty Bifen FC

DATE OUT: January 14, 2015

SUBJECT: End Use Product Chemistry Review
Product Name: Liberty Bifen FC

FROM: Bruce F. Kitchens, Chemist
Product Chemistry Team
Chemistry, Inerts and Toxicology Assessment Branch/RD (7505P)

Bruce F. Kitchens
Jan 14, 2015

TO: RM 03, Kable Davis/Maggie Rudick
Invertebrate and Vertebrate Branch 1/RD (7505P)

SPB 01-14-15

INTRODUCTION:

The registrant, Liberty Crop Protection, LLC, is submitting an application to register the proposed end-use product, Liberty Bifen FC. The active ingredient in this product is Bifenthrin (98.5% pai) at a label nominal concentration of 17.15% a.i. This product is intended for use as an insecticide. In support of this request, the registrant is submitting a proposed basic Confidential Statement of Formula (CSF) dated 27 May 2014; a draft label and product chemistry data contained in MRID# 493979-01, 493979-02, and 493978-9-03. The Chemistry, Inerts, and Toxicology Assessment Review Branch (CITAB) has been asked to review this submission.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Bifenthrin (17.15% ai)

Formulation Type: Not known

2. Has the registrant claimed substantial similarity to a registered product?

[] Yes; [X] No; [] NA; if yes give the registration number of the cited product.

3. All of the source materials of the active ingredient are derived from registered sources- [] Yes [] No

4. All inert ingredients have been screened by IIAB and are approved for the proposed labeled uses.

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5. Confidential Statement of Formula:

☒ Basic - Dated: 27 Mar 2014 Resubmitted Dated:
☐ Alternate - Dated: Resubmitted Dated:

Alternate CSF complies with 40 CFR 152.43
☐ Yes ☐ No ☒ NA

6. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF concurs with product label (PR Notice 91-2).

☒ Yes, if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)
☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☐ NA
Soluble arsenic: ☐ Yes ☐ NA
Isomeric ratios: ☐ Yes ☐ NA
Acid Equivalent: ☐ Yes ☐ NA

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☒ Yes; ☐ No; ☐ NA
Methanol at > 4%: ☐ Yes; ☐ No; ☐ NA
Sodium nitrate/sodium nitrite ☐ Yes; ☐ No; ☐ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?
☐ Yes; ☐ No; ☒ NA; if not, explain below

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

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7. Group A: Product Chemistry Data

TRB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	493979-01
830.1600	Description of materials used to produce the product		X		A	493979-01
830.1650	Description of formulation process		X		A	493979-01
830.1670	Discussion on the formation of impurities		X		A	493979-01
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	473979-01 see csf 5/27/14
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	493979-01

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

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8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Light amber, slightly viscous liquid with an aromatic odor	A	493979-02
830.6314	Oxidation/Reduction	Product is compatible when mixed with water, 10% monoammonium phosphate, Fe powder and kerosene. The product is not compatible when mixed with potassium permanganate. Heat produced in 2 minutes.	A	493979-02
830.6315	Flammability	Flashpoint >97°C	A	493979-03
830.6316	Explodability	Product does not contain explosive components	NA	
830.6317	Storage stability		G	
830.6320	Corrosion Characteristics		G	
830.7000	pH	7.60	A	493979-02
830.7100	Viscosity	130.6 cSt @ 20°C 46.68 cSt @ 40°C	A	493979-02
830.7300	Density (units)	1.039 g/ml	A	493979-02

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CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for the proposed end-use product and has concluded that:

1. The basic formula CSF for the proposed end-use product, Liberty Bifen FC dated 27 May 2014 is acceptable.
2. This submission satisfies the data requirements as specified in 40 CFR 158.320, 158.325, 158.335, 158.340, 158.350, and 158.355 with respect to product identity and composition, description of materials used to produce the product, description of formulation process, discussion of formation of impurities, certified limits, and enforcement analytical method.
3. This submission satisfies the data requirements as specified in 40 CFR 158.310 with respect to physical and chemical properties except for storage stability and corrosion characteristics. Inform the registrant that one year studies are required to satisfy these data requirements.

